

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

DAHLEN KOK HAN WEE,

Plaintiff

v.

Docket No. 21-2885-RPK-TAM

MADALUXE GROUP, LLC,

Defendant

PLAINTIFF'S MOTION TO COMPEL DEPOSITION TESTIMONY

Pursuant to Fed. R. Civ. P. 37, plaintiff Dahlen Kok Han Wee ("Dahlen") hereby moves to compel the deposition testimony of the defendant, Madaluxe Group, LLC ("Madaluxe").

On September 13, 2021 Dahlen on noticed the deposition of Sandra Sholl, the CEO for Madaluxe, for September 24, 2021. Ms. Sholl did not appear. Dahlen renoticed Ms. Sholl's deposition for November 8, 2021, but Ms. Sholl still did not appear.

On October 6, 2021 Dahlen noticed the deposition of Hannah Lagor, the Marketing Manager for Madaluxe, for November 8, 2021. Ms. Lagor did not appear.

On September 13, 2021 Dahlen noticed the deposition of the 30(b)(6) representative of Madaluxe for September 27, 2021, but no representative appeared. Dahlen renoticed the 30(b)(6) deposition for November 8, 2021, but still no representative appeared.

Accordingly, Dahlen moves this Court for an Order requiring Madaluxe to comply with its discovery obligations, and to have Ms. Lagor, Ms. Sholl and its 30(b)(6) representative appear for their depositions within 30 days hereof.

Dahlen also seeks costs, legal fees and other appropriate sanctions for the necessity of

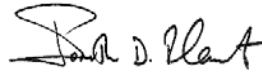
preparing and filing this motion.

Respectfully submitted,

DAHLEN KOK HAN WEE,

Plaintiff

By:

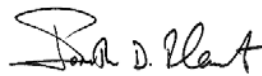


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Dated: November 18, 2021

CERTIFICATION

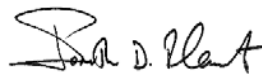
I certify that I attempted in good faith to narrow the issues set forth above through correspondence with counsel for defendant, via e-mail and phone, without success.



Jonathan D. Plaut
Date: November 18, 2021

CERTIFICATION

I certify that I have served this document via electronic and/or First Class Mail upon all parties or their counsel on the date set forth below.



Jonathan D. Plaut
Date: November 18, 2021